



Lawrence S. Lustberg
Director

Gibbons P.C.
One Gateway Center
Newark, NJ 07102-5310
Direct: 973-596-4731 Fax: (973) 596-0545
llustberg@gibbonslaw.com

January 17, 2019

Via ECF

The Honorable John Michael Vazquez
United States District Judge
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

**Re: In re Celgene Corporation, Inc. Securities Litigation,
Civil Action No.: 18-04772 (JMV) (JBC)**

Dear Judge Vazquez:

Pursuant to the stipulation regarding service and schedule for briefing the motion to dismiss entered in the above-captioned matter on October 9, 2018, Defendants Celgene Corporation, Inc. ("Celgene"), Mark J. Alles ("Alles"), Robert J. Hugin ("Hugin"), Scott A. Smith ("Smith"), Peter N. Kellogg ("Kellogg"), Terrie Curran ("Curran"), Jacquelyn A. Fouse ("Fouse"), Philippe Martin ("Martin"), Nadim Ahmed ("Ahmed"), Jonathan Q. Tran ("Tran"), and Peter Callegari ("Callegari") (collectively, the "Celgene Defendants") are prepared to file their motion to dismiss on February 8, 2019.

Given that Plaintiffs' Amended Consolidated Complaint is 211 pages in length, the parties respectfully request permission to file a motion to dismiss brief and opposition to the motion to dismiss brief in excess of this Court's 40 page limit. The parties propose increasing the page limit for each brief to 65 pages. The parties also request that the page limit for the reply brief be increased from 15 pages to 35 pages. Pursuant to Local Civil Rule 7.2, the briefs will be submitted in 14-point proportional font.

We thank the Court for its attention to this matter. Please do not hesitate to have the Court's staff contact us with any questions or if we may be of any service to the Court whatsoever.

GIBBONS P.C.

Hon. John Michael Vazquez
January 17, 2019
Page 2

AGREED AND CONSENTED TO BY:

s/James E. Cecchi

James E. Cecchi
**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY &
AGNELLO, P.C.**
5 Becker Farm Road
Roseland, NJ 07068
Telephone: (973) 994-1700
Facsimile: (973) 994-1744

Christopher A. Seeger
SEEGER WEISS, LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100

Andrew L. Zivitz
Matthew L. Mustokoff
Joshua E. D'Ancona
Margaret E. Mazzeo
Nathan A. Hasiuk
**KESSLER TOPAZ MELTZER &
CHECK LLP**
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (601) 667-7056

Attorneys for Plaintiffs

s/Lawrence S. Lustberg

Lawrence S. Lustberg
Cymetra M. Williams
GIBBONS P.C.
One Gateway Center Newark, NJ 07102
Telephone: (973) 596-4500
Facsimile: (973) 596-0545

Robert C. Micheletto (admitted pro hac
vice)
Nina Yadava (admitted pro hac vice)
Sarah D. Efronson (admitted pro hac vice)
JONES DAY
250 Vesey Street New York, NY 10281
Telephone: (212) 326-3690
Facsimile: (212) 755-7306

Attorneys for Defendants

IT IS SO ORDERED on this ____ day of January 2019.

Honorable John Michael Vazquez, U.S.D.J.